

Message

From: Lensink, Andy [Lensink.Andy@epa.gov]
Sent: 11/5/2018 6:17:27 PM
To: Bohan, Suzanne [bohan.suzanne@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Vranka, Joe [vranka.joe@epa.gov]; Mutter, Andrew [mutter.andrew@epa.gov]; Partridge, Charles [Partridge.Charles@epa.gov]; Wardell, Christopher [Wardell.Christopher@epa.gov]; Faulk, Libby [Faulk.Libby@epa.gov]; Murray, Bill [Murray.Bill@epa.gov]
CC: Coleman, Charles [COleman.Charles@epa.gov]
Subject: RE: Anaconda Mitchell Stadium
Attachments: AJL - AnacondaMitchellStadiumLetter20181102_DRAFT_bbs_MutterEdits.docx; clean - AnacondaMitchellStadiumLetter20181102_DRAFT_bbs_MutterEdits.docx

Attached are redline and clean copies of the letter. Comment boxes are still there.



AJL -

AnacondaMitchel...



clean -

AnacondaMitchel...

From: Bohan, Suzanne
Sent: Monday, November 5, 2018 8:52 AM
To: Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>; Lensink, Andy <Lensink.Andy@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Faulk, Libby <Faulk.Libby@epa.gov>; Murray, Bill <Murray.Bill@epa.gov>
Cc: Coleman, Charles <COleman.Charles@epa.gov>
Subject: RE: Anaconda Mitchell Stadium

Perhaps modify the language to say "all samples taken from the Mitchell Stadium field and track found to be well below residential, recreational, and commercial industrial cleanup standards." Also, we had discussed with Doug raising concerns regarding the misleading sign, but that isn't included in the letter.

Suzanne

From: Smidinger, Betsy
Sent: Friday, November 2, 2018 2:20 PM
To: Vranka, Joe <vranka.joe@epa.gov>; Lensink, Andy <Lensink.Andy@epa.gov>; Bohan, Suzanne <bohan.suzanne@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Faulk, Libby <Faulk.Libby@epa.gov>; Murray, Bill <Murray.Bill@epa.gov>
Cc: Coleman, Charles <COleman.Charles@epa.gov>
Subject: RE: Anaconda Mitchell Stadium
Importance: High

One more point to consider...Charlie just brought to my attention that there is one arsenic level at 309 ppm at 6-12" under the parking lot area (ED 2.1). The action level is >250. Whether or not we would require ARCO to remediate at

this location is still under negotiation of the CD, and would depend on whether we use not-to-exceed levels or weighted averages.

Please let me know if we should keep are letter more general based on this or you are comfortable from a legal perspective proceeding with the revisions.

Betsy

From: Smidinger, Betsy

Sent: Friday, November 2, 2018 2:04 PM

To: Vranka, Joe <vranka.joe@epa.gov>; Lensink, Andy <Lensink.Andy@epa.gov>; Bohan, Suzanne <bohan.suzanne@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Faulk, Libby <Faulk.Libby@epa.gov>; Murray, Bill <Murray.Bill@epa.gov>

Cc: Coleman, Charles <COleman.Charles@epa.gov>

Subject: RE: Anaconda Mitchell Stadium

Hi Joe – Please see my edits. I added the 3 attachments Charlie provided (the sampling locations and associated data, and the photo of the rail), and also added the date the school district dug into the field and the date the permit was received by the county. Please make sure the edits are accurate.

I know we wanted to get this out before the end of the day, so please let me know if anyone else has any comments.

Betsy << File: AnacondaMitchellStadiumLetter20181102_DRAFT bbs edits.docx >> << File: Samp_Local_A-6172_Mitchell.pdf >> << File: A-6172_Mitchell_Stadium_NoAction (1).pdf >> << File: Mitchell Rail pic (10-29-18).pdf >>

From: Vranka, Joe

Sent: Friday, November 2, 2018 1:20 PM

To: Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Lensink, Andy <Lensink.Andy@epa.gov>; Bohan, Suzanne <bohan.suzanne@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Faulk, Libby <Faulk.Libby@epa.gov>; Murray, Bill <Murray.Bill@epa.gov>

Cc: Coleman, Charles <COleman.Charles@epa.gov>

Subject: RE: Anaconda Mitchell Stadium

Hi, Everyone:

Attached is a draft letter to Anaconda School District #10 Superintendent Barnes for signature by Betsy. Please let me know if you have any questions or if you require additional information. I have also attached the school district's permit application that is dated 10/30 – after the excavation had already occurred.

Charlie P.: do you have the soils data? Should we attach it?

<< File: AnacondaMitchellStadiumLetter20181102_DRAFT.docx >> << File: ADP 18-212 application.pdf >>

From: Partridge, Charles

Sent: Friday, November 02, 2018 11:00 AM

To: Vranka, Joe <vranka.joe@epa.gov>; Coleman, Charles <COleman.Charles@epa.gov>

Cc: Wall, Dan <wall.dan@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>

Subject: Football

Just an FYI. I just double checked the data for the 0-2" interval for the actual playing surface of the field. The levels of arsenic are quite low. So low in fact that it would qualify as clean topsoil fill.

Per the 2015 CSOU RAWP and the specification for type A material (cover soil) used on the site require Arsenic: <100mg/kg and approach 30mg/kg. All of the 0-2 inch samples taken on the Mitchell Stadium field (YA1.3, YA1.4 and YA1.5) meet this criteria for arsenic.

cp

From: Vranka, Joe

Sent: Thursday, November 01, 2018 10:59 AM

To: Benevento, Douglas <benevento.douglas@epa.gov>

Cc: Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Bohan, Suzanne <bohan.suzanne@epa.gov>; Mutter, Andrew <mutter.andrew@epa.gov>; Wardell, Christopher <Wardell.Christopher@epa.gov>; Coleman, Charles <Coleman.Charles@epa.gov>; Lensink, Andy <Lensink.Andy@epa.gov>; Faulk, Libby <Faulk.Libby@epa.gov>; Partridge, Charles <Partridge.Charles@epa.gov>; Moon, Diane <Moon.Diane@epa.gov>

Subject: RE: Anaconda Mitchell Stadium

Hi, Doug:

Here is what I know so far. The Anaconda School District was doing some maintenance last week on the sewer line at Mitchell Stadium. When digging around a sewer clean out at the northwest corner of the field, workers encountered a rail approximately 18-22 inches below ground surface. Because of past association of slag and other waste materials with rail lines in Anaconda, they contacted EPA. On Friday October 26, 2018, two EPA contractors responded to the scene along with a representative from the Atlantic Richfield Company. I have attached a PDF document with photos, and a second PDF with an aerial view of the stadium. The third PDF is the story in the Montana Standard yesterday.

Since the rail was buried more than a foot below ground surface and the field had been sampled this summer and was found to be clean, the workers were advised that they could simply backfill the excavation when they were finished and mark the area for further discussion and possible investigation by EPA and Atlantic Richfield under the ongoing community soils operable unit remedial action.

I have a call in to Anaconda Deer Lodge County to see if the school district had a permit from the county for the excavation or if it was small enough to be exempt.

A draft EPA statement follows:

EPA responded with Atlantic Richfield when notified of the rail found in the excavation at Mitchell Stadium last week. The rail is greater than one foot below ground surface, and poses no immediate risk. Sampling data from Mitchell Stadium this summer demonstrates that it is safe for the intended use. EPA will work with the Anaconda School District, Anaconda-Deer Lodge County, the Montana Department of Environmental Quality, and the Atlantic Richfield Company to determine whether further investigation and/or cleanup is warranted.

Please let me know if you have any questions or if you require additional information.

Thank you,

Joe

<< File: Mitchell_RR_pictures.pdf >> << File: AnacondaMitchellStadiumGoogleMaps.pdf >> << File: AnacondaMitchellStadiumArticle20181031_MontanaStandard.pdf >>

-----Original Message-----

From: Benevento, Douglas

Sent: Wednesday, October 31, 2018 5:51 PM

To: Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Bohan, Suzanne <bohan.suzanne@epa.gov>; Vranka, Joe <vranka.joe@epa.gov>

Subject: Anaconda

Bill Everett called re: Montana Standard story. Can we talk to the state, arco, Adlc, and discuss how to manage this.
Sent from my iPhone